

B420A (Official Form 20A) (Notice of Motion or Objection) (12/16)

**United States Bankruptcy Court**  
**Western District of Virginia**

In re	<b>Otto Lee Beddard</b>	)	
	_____	)	
		)	
		)	
Debtor		)	Case No.
		)	<b>16-62198</b>
		)	
		)	
Address	<b>16461 Terry's Run Road</b>	)	
	<b>Unionville, VA 22567</b>	)	Chapter <b>13</b>
		)	
Last four digits of Social Security or Individual		)	
Tax-payer Identification (ITIN) No(s)., (if any):	<b>xxx-xx-7965</b>	)	
Employer's Tax Identification (EIN) No(s). (if any):	_____	)	
	_____	)	

**NOTICE OF HEARING**

Please take notice that on March 23, 2017 at 9:30 a.m. or as soon thereafter as counsel may be heard a hearing will be held on the debtor's Motion to Sell Real Estate Free and Clear of Liens at the US Bankruptcy Court 1101 Court Street Lynchburg VA 24504

**MOTION TO SELL REAL ESTATE FREE AND CLEAR OF LIENS**

1. Comes now the debtor by counsel and files this motion pursuant to 11 USC sec 363(f) and Bankruptcy Rules 6004, 9006(c) and 9014, seeking authority to sell to Keith and Miriam Hunter, certain real property that is located at 5506 Wyndemere Circle Mineral, Virginia 23117.
2. The debtor filed his chapter 13 case on October 31, 2016.
3. On February 12, 2017, the debtor entered into a contract to sell the property to the purchasers for the price of \$175,000.00. The settlement date is March 31, 2017.
4. The mortgage on the property is held by M&T Bank has a balance approximately \$251,700.00, and the property has a tax assessed value of \$243,100..
5. The net proceeds of sale will be applied to the existing liens on the property, in order of their priority. This is a short sale and there will be surplus available for distribution to unsecured creditors.

Wherefore, the debtor requests:

That the sale of the property to Keith and Miriam Hunter be authorized. with all valid deeds of trust, judgments tax liens and other encumbrances being removed from the title to the real property and impressed upon the sale proceeds without change in priority.

That the closing agent be allowed to pay directly from the proceeds of sale the balance owed to existing mortgage any taxes owed and the reasonable and usual costs of closing.

That he be granted such other and further relief as is deemed proper.

/s/Steven Shareff  
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Certificate of Service

I hereby certify that a copy of the foregoing has been served electronically or by mail to the trustee, all creditors and interested parties this 17th day of March, 2017..

/s/ Steven Shareff